



FIDEICOMISO ENERGÍA VERDE
PUERTO RICO
GREEN ENERGY TRUST

**GOVERNMENT OF PUERTO RICO
PUBLIC SERVICE REGULATORY BOARD
PUERTO RICO ENERGY BUREAU**

**IN RE: ENERGY EFFICIENCY AND
DEMAND RESPONSE THREE-YEAR PLAN**

**CASE NO.: NEPR-MI-2026-0002
SUBJECT: Opportunities for Collaboration on
Energy Efficiency Financing and Home Energy
Assessments**

TO THE HONORABLE PUERTO RICO ENERGY BUREAU:

The Puerto Rico Green Energy Trust (PRGET) is an independent nonprofit entity created by the Government of Puerto Rico (Act 17-2019) to expand access to clean, affordable, and reliable energy. PRGET submits these comments in response to the September 22, 2026 Resolution and Order, Attachment A, questions 1 and 2, addressing financing alternatives and coordination with PRGET. We recognize the work required to launch new offerings and propose a partnership between LUMA and PRGET that builds on available capacity while allowing time to address on-bill implementation requirements.

I. PROGRAMA ECOHOGAR: EXISTING FOUNDATION FOR A FINANCING PARTNERSHIP

In February 2026, PRGET launched [Programa EcoHogar](#) to help Puerto Rico households reduce energy use and save money on their electricity bills through energy assessments, guidance, and affordable financing. Through partnerships with local financial cooperativas, homeowners can finance energy-saving improvements—including high-efficiency air conditioners, solar water heaters, refrigerators, and other efficient appliances—as well as net metered solar-plus-battery systems. Multiple improvements can be combined into one loan and one monthly payment, allowing families to use savings on their electricity bills to help repay the loan.

EcoHogar's first participating financial institution, Cooperativa de Ahorro y Crédito Jesús Obrero, handles loan origination, underwriting, and servicing. The program combines a U.S. Department of Energy award with matching cooperativa funds, providing approximately \$1.4 million in financing capital. All loan repayments return to the revolving fund to finance improvements for additional households, extending the impact of the initial investment. PRGET was also able to secure philanthropic funds from the Leon Lowenstein Foundation to support the program's development. These philanthropic funds are now being used to make EcoHogar even more accessible to low- and moderate-income households. With this funding and an established framework for assessments, applications, and financing, PRGET is prepared to work with LUMA on an off-bill offering during the current TYP.

LUMA's filed TYP defers Pay As You Save (PAYS), citing the time and resources required to establish partnerships, customer protections, and administrative processes.¹ PRGET recognizes these implementation considerations and believes EcoHogar provides a foundation on which to advance this work together. Through several verbal and written engagements with LUMA's Customer Programs team since September 2025, PRGET communicated EcoHogar's alignment with the proposed PAYS offering and our readiness to help co-design and administer a program targeting a an FY26 pilot launch. Given those early discussions, we had hoped financing would remain in the filed TYP. We appreciate LUMA's implementation concerns and have reached out to renew

¹ LUMA, TYP filed March 2, 2026, p. 3; April 20, 2026 Motion to Comply, Exhibit 1, responses PREB-13 and PREB-14, pp. 21–25.

discussions about how EcoHogar’s existing framework could support its objectives. Most recently, we have shared with LUMA the ideas shared in this document.

With additional capitalization from LUMA, EcoHogar could serve more households and expand partnerships with additional financial cooperatives. PRGET is prepared to discuss loan terms and program design—including zero-interest financing and a focus on low- and moderate-income households—to align the partnership with LUMA’s energy efficiency, affordability, and customer participation goals.

II. A FAST START, WITH A PATH TO ON-BILL REPAYMENT

Under the proposed off-bill arrangement, LUMA would contribute capital to EcoHogar’s revolving loan fund; participating financial institutions would originate, disburse, and service the loans; and PRGET would administer the program, identify recommended improvements and projecting their energy and bill savings, and oversee implementation and reporting. Customers would repay the financial institution directly, allowing the partnership to begin without changes to LUMA’s billing system. Over time, the partnership could evolve toward on-bill repayment designed to preserve net household savings. That transition would require coordinated work with LUMA and PREB on an approved tariff, billing-system configuration and testing, customer protections, and agreements governing collections and remittances.

III. CAPTURING THE LARGEST RESIDENTIAL SAVINGS OPPORTUNITY

EcoHogar can also help LUMA capture the largest residential savings opportunity identified for the TYP period. The PREB-commissioned Puerto Rico Energy Efficiency Market Baseline and Potential Study identifies Home Energy Reports as the residential measure with the greatest potential to reduce electricity use by FY2028 under its maximum-achievable scenario. The study estimates annual savings of 62,808 MWh in FY2028, more than any other individual residential measure evaluated for that year (Table 1)². PRGET agrees that providing households with clear, actionable information about their energy use and opportunities to save should be a priority.

Table 1. Potential residential energy savings (MWh/year)

Measure	FY2028	FY2040
Home Energy Reports	62,808	53,294
High-Efficiency Ductless Mini-Split AC	48,143	283,122
Tier 2 Advanced Power Strip	32,998	103,901
Refrigerator/Freezer Recycling	16,378	46,724
ENERGY STAR Windows	13,102	106,147
Smart Thermostats	8,857	53,467
Cool Roof	8,643	101,301
Solar Water Heater	5,979	105,114
ENERGY STAR Refrigerator	5,891	40,548
ENERGY STAR Ceiling Fan	4,282	14,152

The Programa EcoHogar process begins with a home energy assessment. A certified evaluator visits the residence, reviews energy consumption, and prepares a report recommending both energy-saving changes in everyday habits and equipment improvements, including their estimated costs and projected savings. This gives each household practical guidance to reduce consumption through everyday actions and a basis for deciding which investments meet its needs.

Utility-sponsored assessments offer an established model for making this guidance accessible. PSEG Long Island’s [Whole House Energy Assessment](#), Dominion Energy South Carolina’s [Home Energy Check-Up](#), and Entergy Mississippi’s [Residential Energy Audit and Direct Install Program](#)

² NV5, *Puerto Rico Energy Efficiency Market Baseline and Potential Study*, prepared for the Puerto Rico Energy Bureau, September 24, 2025, Table 40, p. 78.

provide assessments at no additional cost to eligible residential customers. These programs help households identify energy-saving actions and connect them with additional efficiency offerings.

Each EcoHogar home energy assessment costs \$550: \$400 for the certified evaluator and \$150 for compliance review. PRGET used philanthropic funding to cover a limited number and has asked LUMA to partner in funding all future EcoHogar home energy assessments. Our initial proposal, shared with LUMA on July 2, 2026, identifies an initial 150-household pilot and includes access to the full anonymized assessment dataset—including equipment inventories, energy-use estimates, recommended improvements, and projected savings—to inform future program design.

Continued funding, through an agreed budget and reporting framework, would remove an upfront participation barrier and connect households to financing for recommended improvements.

IV. SUGGESTED NEXT STEPS

PRGET respectfully asks the Bureau to take these comments into consideration in its review of the TYP and encourage LUMA to engage with PRGET to explore:

1. Opportunities to build on EcoHogar’s existing framework for off-bill financing during the current TYP, with the potential to evolve toward an on-bill option.
2. Potential support for EcoHogar home energy assessments at \$550 per household, including the proposed initial 150-household cohort and opportunities to expand access over time.
3. Program terms, customer protections, and reporting approaches that would align a potential partnership with LUMA’s energy efficiency and affordability goals.

Respectfully submitted, October 6, 2026

Puerto Rico Green Energy Trust (PRGET)

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